

CONFLICTS OF INTEREST

Policy:

It is the policy of the Adjutant General's Department to prohibit its employees from engaging in any activity, practice, or conduct which conflicts with, or appears to conflict with, the interests of the Adjutant General's Department, its customers, or its suppliers. Since it is impossible to describe all of the situations that may cause or give the appearance of a conflict of interest, the prohibitions included in this policy are not intended to be exhaustive and include only some of the more clear-cut examples.

Comment:

- (1) Employees are expected to represent the Adjutant General's Department in a positive and ethical manner. Thus, employees have an obligation to avoid conflicts of interest and to refer questions and concerns about potential conflicts to their supervisor. Top management and employees who have contact with customers and suppliers may be required to sign a special statement acknowledging their understanding of and adherence to this policy.
- (2) Employees may not engage in, directly or indirectly either on or off the job, any conduct which is disloyal, disruptive, competitive, or damaging to the Adjutant General's Department. Prohibited activity also includes any illegal acts in restraint of trade.
- (3) Employees may not accept any employment relationship with any organization that does business with, or competes with, the Adjutant General's Department. This prohibition on employment includes serving as an advisor or consultant to any organization of that type, unless the activity is conducted as a representative of the Adjutant General's Department.
- (4) Employees must disclose any financial interest they or their immediate family have in any firm that does business with the Adjutant General's Department or that competes with the Adjutant General's Department. The Adjutant General's Department may require divestiture of the interest if it considers the financial interest to be in conflict with its best interests.
- (5) Employees and their immediate family may not accept gifts or anything of value aggregating more than \$40 during a calendar year, excluding hospitality in the form of food and beverage, from a person with a special interest, if the employee knows or should know the purpose could be to influence the employee.
- (6) Employees may not give, offer, or promise, directly or indirectly, anything of value to any representative of a customer, of a potential customer, or of a financial institution in connection with any transaction or business that the Adjutant General's Department may have with that customer, potential customer, or financial institution.
- (9) Any conflict or potential conflict of interest must be disclosed to the Adjutant General's Department. Failure to do so will result in discipline, up to and including termination.